Lackawaxen
TELECOMMUNICATIONS SERVICES

November 30, 2004

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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20544

Re: In the Matter of The Pay Telephone Reclassification and Compensation
Provisions of the Telecommunications Act of 1996, CC Docket 96-128

Dear Ms. Dortch:

Lackawaxen Long Distance submits this letter and accompanying certification as record
that Lackawaxen Long Distance is not a "Completing Carrier" as that term is defined in
the Commission's Order in CC Docket 96-128 ("Order")[1], released on October 3, 2003,
respecting the obligations of Completing Carriers to provide certain compensation and
reporting to payphone service providers (PSPs), replacing the Commission's interim
compensation rules effective July 1, 2004.

As Lackawaxen Long Distance is not a Completing Carrier nor does it handle the types
of calls the Commission has specified as being subject to both compensation and
reporting to PSPs, Lackawaxen Long Distance is not subject to such requirements at this
time. If Lackawaxen Long Distance operations are altered to the extent that Lackawaxen
Long Distance necessarily becomes a Completing Carrier, Lackawaxen Long Distance
intends to fully comply with the Commission's rules pertaining to this and all other
payphone compensation and reporting matters.

Sincerely,

Harold Switzer
Vice President/ General Manager
Lackawaxen Long Distance

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cc: Ms. Ruth Jaeger
President
APCC Services, Inc.
625 Slater Lane, Suite 104
Alexandria, Virginia 22314

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[1] *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act
of 1996*, CC Docket No. 96-128, Report and Order, (2003) (Order).

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Lackawaxen
TELECOMMUNICATIONS SERVICES

PAY TELEPHONE COMPLETING CARRIER CERTIFICATION
OF LACKAWAXEN LONG DISTANCE

1.   My name is Harold Switzer. I currently serve as the Vice President/ General Manager of Lackawaxen Long Distance, (LWX) a provider of interstate interexchange telecommunications services as a toll reseller in the state of Pennsylvania. In this capacity, I have become familiar with the network operations of LWX and its practices associated with the completion of calls originated from Pay Telephones.

2.   LWX is not a Completing Carrier as defined by Commission in 47 CFR § 64.1300.

3.   With respect to coinless access code calls, LWX is a switchless reseller that contracts with ANPI, a switchless wholesaler for LD services that participates in a 100% opt in All Call Attempt Option with MCI. LWX pays ANPI and ANPI compensates MCI, the facilities based reseller for these type of calls.

4.   With respect to subscriber toll-free payphone calls, LWX is a switchless reseller. LWX contracts with ANPI for completion of subscriber toll-free calls.

5.   LWX does not perform call validation or processing functions for either access code calls or subscriber toll-free payphone calls.

6.   LWX does not create call detail records for either access code calls or subscriber toll-free payphone calls. LWX's action with respect to call detail records is limited to rating and billing.

7.   LWX compensates MCI and/or ANPI for the wholesale cost of the call.

8.   LWX has confirmed with ANPI that any calls purchased by LWX are included in the respective call tracking systems and compensation remittance process of ANPI and MCI.

9.   In consideration of the aforementioned facts, LWX is not subject to the compensation or reporting requirements related to the Commission's Report and Order[1] and associated revisions to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

I certify under penalty of perjury under the laws of the United States of America

that the foregoing is true and correct.

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[1]   *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996,* CC Docket No. 96-128, Report and Order, (2003) (Order).

Executed on *November 30, 2004*

Harold Switzer
Vice President/General Manager
Lackawaxen Long Distance
Hotel RD PO Box 8
Rowland, PA 18457